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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 19- ^{1149 RT} 1142 -RT
)	
Plaintiff,)	CRIMINAL COMPLAINT;
)	AFFIDAVIT IN SUPPORT OF
v.)	CRIMINAL COMPLAINT
)	
CHAD KAUHANE,)	
)	
Defendant.)	
_____)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true
and correct to the best of my knowledge and belief:

INTRODUCTION

1. This affidavit is submitted for the purpose of establishing probable
cause that on or about September 24, 2019, within the District of Hawaii, Chad

Kauhane (Kauhane) engaged in conduct that violated 18 U.S.C. § 1709, which makes it a crime to steal or remove mail, or the articles within any mail, by an employee of the United States Postal Service (USPS).

2. I am a Special Agent (SA) with the USPS Office of the Inspector General (OIG) and assigned to the Pacific Area Field Office, and I have served in this capacity since 2016.

3. I am familiar with the facts set forth in this affidavit based upon my personal knowledge and/or information provided to me by other law enforcement personnel and/or witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint charging defendant with a violation of federal law. Accordingly, this affidavit does not set forth all of the facts known to me or to the USPS OIG regarding this matter. Summaries and statements from conversations do not include references to all topics covered in the conversations. This affidavit is not intended to include each and every fact and matter observed or known by the government.

PROBABLE CAUSE

4. Between December 2018 and September 2019, approximately 22 parcels suspected of containing marijuana went missing while in the possession of the USPS. Prior to their disappearance, these parcels had been intercepted by various Post Offices (P.O.) across Hawaii, placed in larger containers, and assigned

new tracking numbers. The parcels were then mailed to the United States Postal Inspection Services (USPIS) for further inspection, but went missing before they arrived at the USPIS.

5. An analysis of the tracking history of the missing parcels revealed that the thefts were likely occurring at the Small Parcel/Bundle Sorter (SPBS), Machine #002, at the Honolulu P&DC where the parcels travelled while en route to the USPIS. As such, an investigation began at the SPBS. Video surveillance was installed above the bin at the SBPS containing parcels destined to the 96820 zip code, where the USPIS is located. As a result of the surveillance, Kauhane became the primary suspect.

6. The video surveillance at the SPBS captured an individual resembling Chad Kauhane on seven (7) separate occasions as he removed parcels from the 96820 bin. Kauhane is a Mail Processing Clerk and had been employed in this position since July 9, 1994.

7. On September 24, 2019, USPS OIG agents were present at the SPBS and observed Kauhane rifling through a parcel that he removed from the SPBS 002 96820 bin. That parcel was a Medium Flat Rate Priority Parcel bearing tracking number 9505511481639263666361 (the Medium Flat Rate Priority Parcel). Agents observed Kauhane remove a smaller parcel from within the Medium Flat Rate Priority Parcel before disposing of the Medium Flat Rate Priority Parcel.

8. Later, the USPS OIG agents confronted Kauhane as he exited the facility. Kauhane had the smaller parcel in his backpack and had marijuana (which appeared to have come from within the smaller parcel) in his lunch cooler. An agent also retrieved the Medium Flat Rate Priority Parcel that Kauhane had disposed of within the facility.

9. Kauhane was interviewed in a non-custodial setting. During the interview, Kauhane admitted to stealing numerous marijuana parcels that he knew were en route to the USPIS. Kauhane could not specifically recall the tracking numbers of these parcels or dates the thefts occurred on.

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CONCLUSION

10. Based on the foregoing facts, I respectfully submit that probable cause exists to believe that CHAD KAUHANE, the defendant, committed the aforementioned offense.

Respectfully submitted,


Barrett Nakachi

Barrett Nakachi
Special Agent
United States Postal Service
Office of the Inspector General

This Criminal Complaint and Affidavit in support thereof were presented to, approved by, and probable to believe that the defendant above-named committed the charged crime found to exist by the undersigned Judicial Officer at 1326 on November 5, 2019.

Subscribed and sworn to before me,
this 5 th day of November, 2019.

Rom Trader
Rom Trader
United States Magistrate Judge
District of Hawaii

The seal of the United States District Court for the District of Hawaii is circular. It features an eagle with spread wings in the center, perched on a shield. The words "UNITED STATES DISTRICT COURT" are written in a circle around the eagle, and "DISTRICT OF HAWAII" is written at the bottom. There are stars on either side of the eagle's feet.